

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

as representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**DECLARATION OF ROBERT GORDON IN SUPPORT OF THE  
MOTION OF THE OFFICIAL COMMITTEE OF  
RETIRED EMPLOYEES OF THE COMMONWEALTH  
OF PUERTO RICO TO EXTEND THE VOTING DEADLINE FOR  
HOLDERS OF CLAIMS IN CLASSES 51B, 51D, 51E, 51F, AND 51L**

I, Robert D. Gordon, hereby declare as follows under 28 U.S.C. § 1746:

1. I have personal knowledge of and am competent to testify as to the matters set forth herein.

2. I submit this Declaration in support of the *Motion of the Official Committee of Retired Employees of the Commonwealth of Puerto Rico to Extend the Voting Deadline for Holders of Claims in Classes 51B, 51D, 51E, 51F, and 51L* [Dkt. 18214] (the “**Motion**”), filed earlier today, which seeks a fourteen-day extension of the deadline to return ballots for retirees

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<sup>1</sup> The Debtors in these jointly-administered PROMESA title III cases (these “Title III Cases”), along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

eligible to vote on the *Seventh Amended Title III Joint Plan of Adjustment for the Commonwealth of Puerto Rico et al.* [Dkt. 17629] (the “**Plan**”).

3. I am a partner in the firm of Jenner & Block LLP, and have been duly admitted to practice law in the States of Illinois, Michigan, and New York.

4. I am the lead attorney from Jenner representing the Retiree Committee in connection with the above-captioned Title III Case.

5. Attached as Exhibit A to this declaration is a true and correct copy of an email I received from Steve Ma, counsel to the Oversight Board, on September 13, 2021. Exhibit A includes: (i) a September 10, 2021 vote tally referenced in paragraph 9 of the Motion and (ii) a communication on September 13, 2021 from Mr. Ma to me regarding a communication that the Oversight Board’s professionals received from the U.S. Postal Service regarding delivery delays, referenced in paragraph 12 of the Motion.

6. Attached as Exhibit B to this declaration is a true and correct copy of an email I received from Alex Orchowski of Prime Clerk LLC on September 17, 2021, which includes the September 17, 2021 vote tally referenced in paragraphs 2 and 9 of the Motion.

7. Attached as Exhibit C to this declaration is a true and correct copy of an email I received from Brian Rosen, counsel to the Oversight Board, on September 22, 2021, referenced in paragraph 15 of the Motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York  
September 23, 2021

/s/ Robert D. Gordon  
Robert D. Gordon